

Jorge F. Coombs, Esquire (*NJ Attorney ID # 017962002*)
YOUNGBLOOD FRANKLIN
SAMPOLI & COOMBS, P.A.
1201 New Road, Suite 230
Linwood, NJ 08221
Tel: (609) 601-6600
Fax: (609) 601-6601
E-mail: jcoombs@youngbloodlegal.com
Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)**

**H. FRANK FIFE and JOHN G. AND
ELIZABETH STEELMAN
FOUNDATION,**

Plaintiffs,

v.

WILLIAM P. BARR, in his official
capacity as Attorney General of the United
States and executive of the U.S. Department
of Justice;

KEVIN K. MCALEENAN, in his official
capacity as Acting Secretary of the U.S.
Department of Homeland Security;

KENNETH T. CUCCINELLI, in his
official capacity as Acting Director of U.S.
Customs and Border Protection;

MARK A. MORGAN, in his official
capacity as Acting Director of U.S.
Immigration and Customs Enforcement; and

JUDSON W. MURDOCK, II, in his
official capacity as Houston CBP Director of
Field Operations, individually, jointly,
separately and in the alternative,

Defendants.

CIVIL ACTION

CASE NO.: 1:19-cv-13912-NLH-AMD

Motion Return Date: October 21, 2019

**PLAINTIFFS' NOTICE OF MOTION
TO STAY
FIVE YEAR ENTRY BAR
AND
CERTIFICATION OF SERVICE**

PLEASE TAKE NOTICE that on October 21, 2019, or as soon thereafter as counsel may be heard, Plaintiffs H. Frank Fife and the John G. and Elizabeth Steelman Foundation shall move before the Honorable Noel L. Hillman, United States District Judge, at the Mitchell H. Cohen Building & U.S. Courthouse, located at 4th & Cooper Streets in Camden, New Jersey, for an Order to Stay the Five (5) Year Entry Bar administrative order, presently imposed pursuant to I.N.A. § 212(a)(9), on Erika Contreras Cruz, Plaintiffs' F-1 student visa designee, pending final resolution of the above-captioned action.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Plaintiffs will rely on their attached Brief in Support of Motion to Stay Five Year Entry Bar. A proposed form of Order is included with this Notice of Motion.

Respectfully submitted,

YOUNGBLOOD FRANKLIN
SAMPOLI & COOMBS, PA

A handwritten signature in black ink, appearing to read 'Jorge F. Coombs', with a large, stylized initial 'J' and a horizontal line extending to the right.

Dated: September 27, 2019

By: _____

JORGE F. COOMBS, ESQUIRE
Attorney for Plaintiffs

CERTIFICATION OF SERVICE

I, Jorge F. Coombs, Esquire, hereby certify that on September 27, 2019 I electronically filed and served copies of the within motion with the Clerk of the United States District Court for the District of New Jersey and served same upon Counsel for Defendants by Regular Mail and through the Court's CM/ECF system:

**Clerk of the District Court
United States District Judge for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101**

**T. Benton York, Esquire
Trial Attorney
United States Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 Ben Franklin Station
Washington, D.C. 20044
Thomas.B.York@usdoj.gov**



Dated: September 27, 2019

By: _____
JORGE F. COOMBS, ESQUIRE
Attorney for Plaintiffs